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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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CLERK OF COURT
WESTERN DISTRICT OF TENNESSEE

La Sonya Epps
4628 Jorguil Lane
Mphs Tenn 38109
(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Family Home Health Care Agency
1180 Missa Place
Mphs Tenn 38104
(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, La Sonya Epps
(name of plaintiff)

is a citizen of the United States and resides at 4628 Jorguil Lane
(street address)

Mphs United States Tenn
(city) (country) (state)

38109 901 643-9283
(zip code) (telephone number)

3. Defendant Family Home Health Care
(defendant's name)

lives at, or its business is located at 1180 Minna Place
(street address)

Mphs Tenn 38104

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1180 Minna Place

(street address)

Mphs
(city)

United States
(country)

Tenn
(state)

38104
(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 12 01 2012

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 30th 4 2012. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ____ race, (2) ____ color, (3) ____ sex, (4) ____ religion, (5) ____ national origin, defendant

(a) ____ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ____ failed to promote plaintiff.

(d) ____

10. The circumstances under which defendant discriminated against plaintiff were as follows: Plaintiff was caretaker for company working inside client's home and was sexual harass/sexual assault by client. The company investigated with no prove only verbal prove from both sides and made decision to allow plaintiff to leave under unemployment which was approved.

11. The acts set forth in paragraph 9 of this complaint

- (a) ____ are still being committed by defendant.
- (b) ____ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ____ Defendant be directed to employ plaintiff, or
- (b) ☒ Defendant be directed to re-employ plaintiff, or
- (c) ____ Defendant be directed to promote plaintiff, or;
- (d) ____ Defendant be directed to pay plaintiff backpay from last check received

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes () No (X)

DeLora Epps
SIGNATURE OF PLAINTIFF